

Appendix G2

**Dataset Received from S.C. Johnson & Son, Inc. in Support of
Cuellar et al. (2002) Poster Presentation**

[This Page Intentionally Left Blank]



A FAMILY COMPANY

S.C. Johnson & Son, Inc.
Worldwide Consumer Products, RD & E
Global Safety Assessment and Regulatory Affairs, Product Toxicology
MS 139 1525 Howe Street, Racine WI 53403

September 3, 2004

Christina Inhof, MSPH
Senior Project Coordinator/Technical Writer ILS, Inc.
NICEATM
P.O. Box 12233
NIEHS MD EC-17
Research Triangle Park, NC 27709

Christina,

Hi! How are you? I am happy to be submitting the data on benchmark and fragrance formulations, which were partially discussed in the poster citation listed below:

Cuellar, N., Merrill, J.C., Clear, M.L., Mun G., and Harbell J.W. 2002. The application of benchmarks for the evaluation of the potential ocular irritancy of aerosol fragrances. *The Toxicologist* 66(1-S): 243-244.

Included with this submission are the following documents:

1. Cover letter
2. Data spreadsheet
3. Fragrance graphs
4. Coded formula spreadsheet

Study Protocols:

Standard Draize protocol was used for 4 of the in-vivo studies. The EPA aerosol protocol was used for test material #3. Standard BCOP protocol was used for the in-vitro work at IIVS. BCOP exposure times were 3 and 10 minutes with post exposure of 2 hours.

Formula Spreadsheet:

The formulas listed in this spreadsheet are coded similarly to past submissions. For benchmarks, test material number is the unique sample number whereas the group description is referenced in the poster as type of benchmark. Test material #3 and #4 (Alcohol-based benchmark) is not listed in the poster. For fragrance formulas, test material denotes the category (formula) whereas the group describes the formula form (i.e aerosol vs membrane (gel)). Fragrances formulas are referenced in the poster. For both benchmarks and formulations, raw materials are listed followed by their percentages.

Poster:

Benchmark poster not included. John Harbell previously sent it to you.

Graphs:

Graphs plot the BCOP total score per each unique fragrance formulation. Graphs include reference benchmarks (see formula spreadsheet) and the ethanol control. The bars show one standard deviation from the mean value for each benchmark and the ethanol. Please note that the ethanol values displayed on the 3-minute exposure graphs are for a 3-minute exposure to ethanol (not the 10-minute exposure ethanol that was performed as the positive control). There are 9 tabs in this spreadsheet. Graphs are labeled per form ((2 for aerosol and 2 for membrane (gel)) and exposure time (3 or 10 minutes) in tabs 1-8. The first two graphs refer to the aerosol formulas and the second two graphs refer to the membrane. Each graph includes the corresponding raw data in the next tab. There are 44 aerosol formulas depicted in the aerosol graphs and 36 membrane formulas depicted in the membrane graphs. The final tab describes the basic statistics on the ethanol control and each benchmark by exposure time.

Data Worksheet:

The data worksheet consists of 4 tabs at the bottom of the page. We are including all tabs to clearly demonstrate how we analyzed the data into the GHS and EPA categories in the summary spreadsheet shown in tab #4.

Summary spreadsheet:

The summary spreadsheet is sorted by test material. The test material number refers to the benchmark formula or ethanol listed in the formula spreadsheet. GHS and EPA categories are in the next 8 columns in yellow. The last 2 columns consist of the mean BCOP total scores (3 and 10 minute) in blue. EPA and GHS criteria are summarized in this spreadsheet.

Data was analyzed per formula. Raw data scores from the first three days and days to clear per each of 6 rabbits were randomly put into combinations of three and categorized accordingly based on EPA or GHS criteria. This analysis resulted in a total of 20 combinations per formula. Each combination was listed in the appropriate GHS or EPA category. Scoring assumptions are also listed in this spreadsheet based on protocol differences.

Protocol used for the BCOP assay was the same for all benchmarks and ethanol formulas. In-vivo studies were conducted using the standard Draize protocol with the exception of the ethanol/fragrance benchmark. The ethanol/fragrance benchmark utilized the EPA aerosol dosing Draize protocol.

The ethanol/fragrance benchmark is used to evaluate specific aerosol formulations. This benchmark shows that even though the formulation would be irritating in the standard Draize Assay, the product is provided in a form that restricts exposure to the aerosol route by limiting exposure via a metered dose. The metered dosing approach demonstrates that new formulations would not exceed the irritation potential of the benchmark.

As shown in the graphs and the summary table, the BCOP is able to rank irritation of a variety of formulations in comparison to the benchmarks. Severe irritants can be identified using this methodology. The fragrance level in the formula does impact the irritation potential of the formula.

September 2, 2004

These data demonstrate the importance of assessing all new formulations relative to an appropriate fixed benchmark.

If you have any questions or comments on this data set, please feel free to contact either Judith Swanson or myself at the following:

Nicole Cuellar
(262) 260-6916
ncuellar@scj.com

Judith Swanson
(262) 260-2688
jeswanso@scj.com

Sincere regards,

/s/
/

Nicole Cuellar
Sr. Research Toxicologist

In Vivo Data - S.C. Johnson Submission Dated September 3, 2004

March 2006

Volume	ANIMAL ID	TEST MATL	TIME	CORNEAL		CONJUNCTIVAL			DRAIZE	DAYS-TO-CLEAR
				OPACITY	AREA	IRIS	REDNESS	CHEMOSIS		
0.1	F38948	#1	24	1	2	1	2	2	2	27 EPA
			48	1	1	0	2	1	0	11 14
			72	1	1	0	0	1	0	7 GHS
			7 days	0	0	0	2	0	0	4 14
			14 days	0	0	0	0	0	0	0
			21 days							0
GHS Tissue	ANIMAL ID	MATL	MAS	OPACITY	AREA	IRIS	REDNESS	CHEMOSIS	DISCHARGE	DIC EPA DIC GHS
	F38948	#1		27	1.0	1.3	0.3	1.3	1.3	0.7 14 14
Summary block used analysis of the twenty combinations	ANIMAL ID									
	1	#1		27	1.0	1.3	0.3	1.3	1.3	0.7 14 14
	2	#1		34	0.7	1.3	0.3	2.3	1.3	0.7 14 14
	3	#1		37	0.7	2.0	0.3	2.0	1.3	0.7 7 14
	4	#1		35	1.0	2.3	1.0	2.0	1.3	0.3 7 14
	5	#1		39	1.0	2.7	1.0	2.7	1.3	2.0 14 14
	6	#1		30	1.0	1.7	1.0	2.7	1.3	0.3 14 14
Dose Vol			0.1							
Volume	ANIMAL ID	TEST MATL	TIME	CORNEAL		CONJUNCTIVAL			DRAIZE	DAYS-TO-CLEAR
0.1	R2266	#2	24	0	0	0	0	0		
			48	0	0	0	0	0	0	0
			72							GHS
			7 days							0
			14 days							0
			21 days							0
GHS Tissue	ANIMAL ID	MATL	MAS	OPACITY	AREA	IRIS	REDNESS	CHEMOSIS	DISCHARGE	DIC EPA DIC GHS
	R2266	#2		2	0.0	0.0	0.0	0.0	0.0	0 0 2
Summary block used analysis of the twenty combinations	ANIMAL ID									
	1	#2		2	0.0	0.0	0.0	0.5	0.0	0.0 0 2
	2	#2		2	0.0	0.0	0.0	0.5	0.0	0.0 0 2
	3	#2		4	0.0	0.0	0.0	0.7	0.3	0.0 0 3
	4	#2		2	0.0	0.0	0.0	0.7	0.0	0.0 0 3
	5	#2		2	0.0	0.0	0.0	0.7	0.0	0.0 0 3
	6	#2		4	0.0	0.0	0.0	0.7	0.7	0.0 0 3
Dose Vol			0.1							

Volume	ANIMAL ID	TEST MATL	TIME	CORNEAL		IRIS	REDNESS	CONJUNCTIVAL		DRAIZE	DAYS-TO-CLEAR
				OPACITY	AREA			CHEMOSIS	DISCHARGE		
0.1	F38949	#1	24	1	3	1	3	2	2	34	EPA
			48	1	1	0	2	1	0	11	14
			72	0	0	0	2	1	0	6	GHS
			7 days	1	1	0	1	0	0	7	14
			14 days	0	0	0	0	0	0	0	
			21 days							0	
Combination block #1	ANIMAL ID	MATL	MAS	OPACITY	AREA	IRIS	REDNESS	CHEMOSIS	DISCHARGE	DIC EPA	DIC GHS
	F38949	#1	34	0.666667	1.333333	0.333333	2.333333333	1.333333333	0.666666667	14	14
	Combinations	Opacity	Iris	Redness	Chemosis	DtC EPA	DtC GHS			Combinations	Opacity
	1,2,3	0.833333	0.333333	2.166667	1.333333	14	14			1,3,4	1
	GHS Rating	4	4	2	4	14	14			GHS Rating	2
	1,2,4	1	0.666667	2.166667	1.333333	14	14			1,3,5	1
	GHS Rating	2	4	2	4	14	14			GHS Rating	2
	1,2,5	1	0.666667	2.5	1.333333	14	14			1,3,6	1
	GHS Rating	2	4	2	4	14	14			GHS Rating	2
	1,2,6	1	0.666667	2.5	1.333333	14	14			1,4,5	1
Combination block #1	GHS Rating	2	4	2	4	14	14			GHS Rating	2
	ANIMAL ID	MATL	MAS	OPACITY	AREA	IRIS	REDNESS	CHEMOSIS	DISCHARGE	DIC EPA	DIC GHS
	R2317	#2	24	0	0	0	0	0	0	2	EPA
			48	0	0	0	0	0	0	0	0
			72							0	GHS
			7 days							0	2
			14 days							0	
			21 days							0	
	ANIMAL ID	MATL	MAS	OPACITY	AREA	IRIS	REDNESS	CHEMOSIS	DISCHARGE	DIC EPA	DIC GHS
	R2317	#2	2	0	0	0	0.5	0	0	0	2
Combination block #1	Combinations	Opacity	Iris	Redness	Chemosis	DtC EPA	DtC GHS			Combinations	Opacity
	1,2,3	0	0	0.583333	0.166667	0	3			1,3,4	0
	GHS Rating	4	4	4	4	0	3			GHS Rating	4
	1,2,4	0	0	0.583333	0	0	3			1,3,5	0
	GHS Rating	4	4	4	4	0	3			GHS Rating	4
	1,2,5	0	0	0.583333	0	0	3			1,3,6	0
	GHS Rating	4	4	4	4	0	3			GHS Rating	4
	1,2,6	0	0	0.583333	0.333333	0	3			1,4,5	0
	GHS Rating	4	4	4	4	0	3			GHS Rating	4

In Vivo Data - S.C. Johnson Submission Dated September 3, 2004

March 2006

Volume	ANIMAL ID	TEST MATL	TIME	CORNEAL		IRIS	REDNESS	CONJUNCTIVAL		DRAIZE	DAYS-TO-CLEAR
				OPACITY	AREA			CHEMOSIS	DISCHARGE		
0.1	F38950	#1	24	1	4	1	2	2	2	37	EPA
			48	1	2	0	2	1	0	16	7
			72	0	0	0	2	1	0	6	GHS
			7 days	0	0	0	1	0	0	2	14
			14 days	0	0	0	0	0	0	0	
			21 days							0	
ANIMAL ID MATL MAS OPACITY AREA IRIS REDNESS CHEMOSIS DISCHARGE DtC EPA DtC GHS											
Redness	F38950	#1	37	0.666667	2	0.333333	2	1.33333333	0.666666667	7	14
	Chemosis	DtC EPA	DtC GHS								
	2	1.333333	14	14	Combination block	1,4,6	1.0	1.0	2.3	1.3	14
	2	4	14	14	GHS Rating	2	4	2	4	4	14
	2.333333	1.333333	14	14	#3	1,5,6	1.0	1.0	2.7	1.3	14
	2	4	14	14	GHS Rating	2	4	2	4	4	14
	2.333333	1.333333	14	14		2,3,4	0.8	0.7	2.2	1.3	14
	2	4	14	14	GHS Rating	4	4	2	4	4	14
Volume	2.333333	1.333333	14	14		2,3,5	0.8	0.7	2.5	1.3	14
	2	4	14	14	GHS Rating	4	4	2	4	4	14
	R2314	#2	24	0	0	0	1	1	0	4	EPA
			48	0	0	0	1	0	0	2	0
			72	0	0	0	0	0	0	0	GHS
			7 days							0	
Redness			14 days							0	
			21 days							0	
ANIMAL ID MATL MAS OPACITY AREA IRIS REDNESS CHEMOSIS DISCHARGE DtC EPA DtC GHS											
R2314	#2	4	0	0	0	0.666666667	0.33333333	0	0	3	
Chemosis	DtC EPA	DtC GHS									
0.666667	0.166667	0	3	Combination block	1,4,6	0.0	0.0	0.7	0.3	0	
4	4	0	3	GHS Rating	4	4	4	4	0	3	
0.666667	0.166667	0	3	#3	1,5,6	0.0	0.0	0.7	0.3	0	
4	4	0	3	GHS Rating	4	4	4	4	0	3	
0.666667	0.666667	0.5	0	3		2,3,4	0.0	0.0	0.7	0.2	0
	4	4	0	3	GHS Rating	4	4	4	4	0	3
	0.666667	0	0	3		2,3,5	0.0	0.0	0.7	0.2	0
	4	4	0	3	GHS Rating	4	4	4	4	0	3

In Vivo Data - S.C. Johnson Submission Dated September 3, 2004

March 2006

Volume	ANIMAL ID	TEST MATL	TIME	CORNEAL		IRIS	REDNESS	CONJUNCTIVAL		DRAIZE	DAYS-TO-CLEAR
				OPACITY	AREA			CHEMOSIS	DISCHARGE		
0.1	F38951	#1	24	1	4	1	2	2	1	35	EPA
			48	1	2	1	2	1	0	21	7
			72	1	1	1	2	1	0	16	GHS
			7 days	0	0	0	1	0	0	2	14
			14 days	0	0	0	0	0	0	0	
			21 days							0	
Combination block #4	ANIMAL ID	MATL	MAS	OPACITY	AREA	IRIS	REDNESS	CHEMOSIS	DISCHARGE	DtC EPA	DtC GHS
	F38951	#1	35	1	2.333333	1	2	1.333333333	0.333333333	7	14
	Combinatio	Opacity	Iris	Redness	Chemosis	DtC EPA	DtC GHS			Combinations	Opacity
	2,3,6	0.8	0.7	2.5	1.3	14	14			3,4,5	1.0
	GHS Rating	4	4	2	4	14	14			GHS Rating	2
	2,4,5	1.0	1.0	2.5	1.3	14	14			3,4,6	1.0
	GHS Rating	2	4	2	4	14	14			GHS Rating	2
	2,4,6	1.0	1.0	2.5	1.3	14	14			3,5,6	1.0
	GHS Rating	2	4	2	4	14	14			GHS Rating	2
	2,5,6	1.0	1.0	2.7	1.3	14	14			4,5,6	1.0
	GHS Rating	2	4	2	4	14	14			GHS Rating	2
Combination block #4	ANIMAL ID	MATL	MAS	OPACITY	AREA	IRIS	REDNESS	CHEMOSIS	DISCHARGE	DRAIZE	DAYS-TO-CLEAR
	R2299	#2	24	0	0	0	1	0	0	2	EPA
			48	0	0	0	1	0	0	2	0
			72	0	0	0	0	0	0	0	GHS
			7 days							0	
			14 days							0	
			21 days							0	
	ANIMAL ID	MATL	MAS	OPACITY	AREA	IRIS	REDNESS	CHEMOSIS	DISCHARGE	DtC EPA	DtC GHS
	R2299	#2	2	0	0	0	0	0.666666667	0	0	3
	Combinatio	Opacity	Iris	Redness	Chemosis	DtC EPA	DtC GHS			Combinations	Opacity
	2,3,6	0.0	0.0	0.7	0.5	0	3			3,4,5	0.0
	GHS Rating	4	4	4	4	0	3			GHS Rating	4
	2,4,5	0.0	0.0	0.7	0.0	0	3			3,4,6	0.0
	GHS Rating	4	4	4	4	0	3			GHS Rating	4
	2,4,6	0.0	0.0	0.7	0.3	0	3			3,5,6	0.0
	GHS Rating	4	4	4	4	0	3			GHS Rating	4
	2,5,6	0.0	0.0	0.7	0.3	0	3			4,5,6	0.0
	GHS Rating	4	4	4	4	0	3			GHS Rating	4

In Vivo Data - S.C. Johnson Submission Dated September 3, 2004

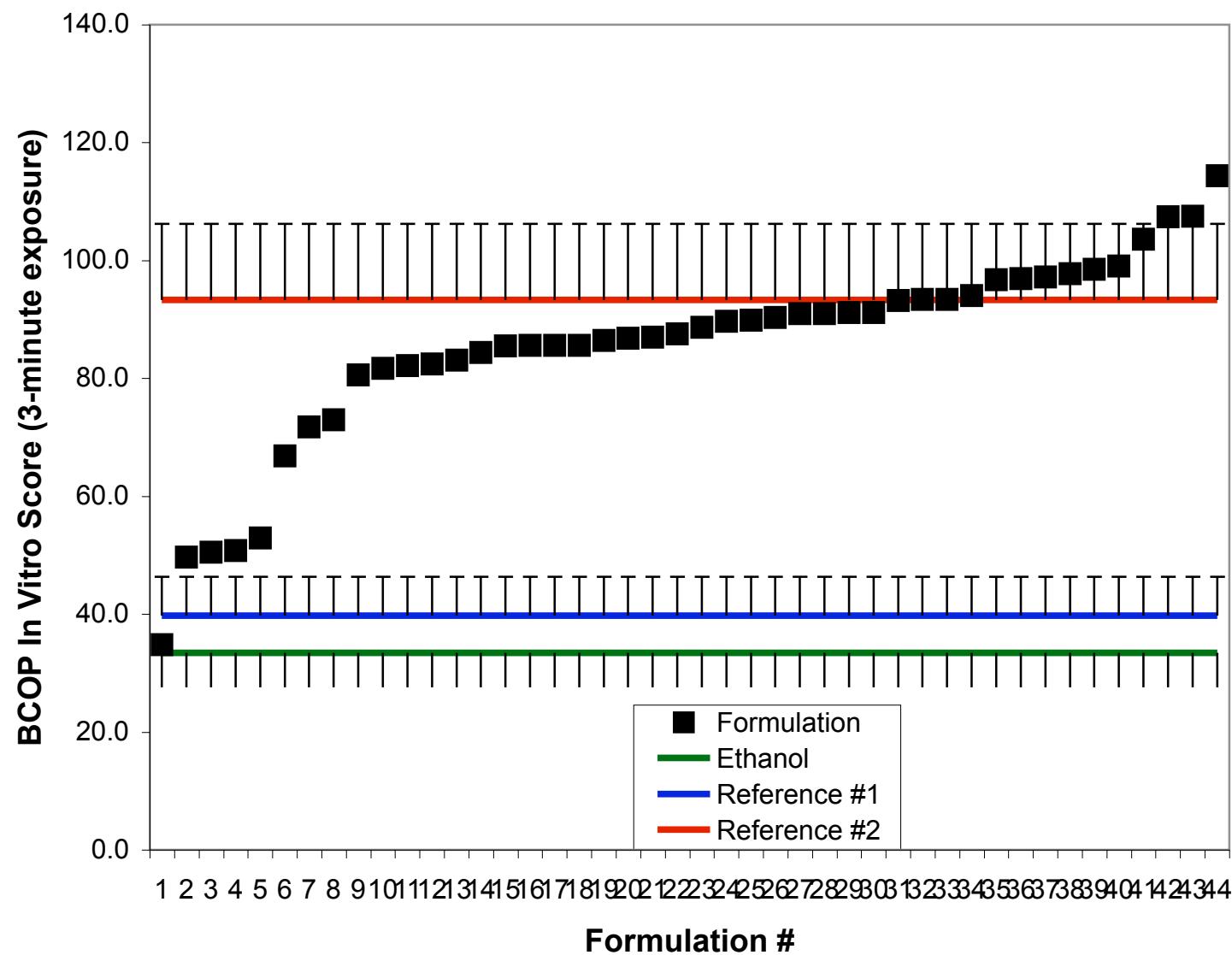
March 2006

Volume	ANIMAL ID	TEST MATL	TIME	CORNEAL		IRIS	REDNESS	CONJUNCTIVAL		DRAIZE	DAYS-TO-CLEAR
				OPACITY	AREA			CHEMOSIS	DISCHARGE		
0.1	F38952	#1	24	1	4	1	2	2	3	39	EPA
			48	1	3	1	3	1	2	32	14
			72	1	1	1	3	1	1	20	GHS
			7 days	1	1	0	1	1	0	9	14
			14 days	0	0	0	0	0	0	0	
			21 days							0	
Redness	Chemosis	DtC EPA	DtC GHS							DtC EPA	DtC GHS
2.3	1.3	14	14					Summary		1,2,3	14
2	4	14	14			#1		1,2,4		2	14
2.3	1.3	14	14					1,2,5		2	14
2	4	14	14					1,2,6		2	14
2.7	1.3	14	14					1,3,4		2	14
2	4	14	14					1,3,5		2	14
2.7	1.3	14	14					1,3,6		2	14
2	4	14	14					1,4,5		2	14
								1,4,6		2	14
								1,5,6		2	14
Volume	ANIMAL ID	TEST MATL	TIME	CORNEAL		IRIS	REDNESS	CONJUNCTIVAL		DRAIZE	DAYS-TO-CLEAR
				OPACITY	AREA			CHEMOSIS	DISCHARGE		
0.1	R2275	#2	24	0	0	0	1	0	0	2	EPA
			48	0	0	0	1	0	0	2	0
			72	0	0	0	0	0	0	0	GHS
			7 days							0	
			14 days							0	
			21 days							0	
Redness	Chemosis	DtC EPA	DtC GHS					Summary		DtC EPA	DtC GHS
								1,2,3			
0.7	0.2	0	3			#2		1,2,4		4	3
4	4	0	3					1,2,5		4	3
0.7	0.5	0	3					1,2,6		4	3
4	4	0	3					1,3,4		4	3
0.7	0.5	0	3					1,3,5		4	3
4	4	0	3					1,3,6		4	3
0.7	0.3	0	3					1,4,5		4	3
4	4	0	3					1,4,6		4	3
								1,5,6		4	3

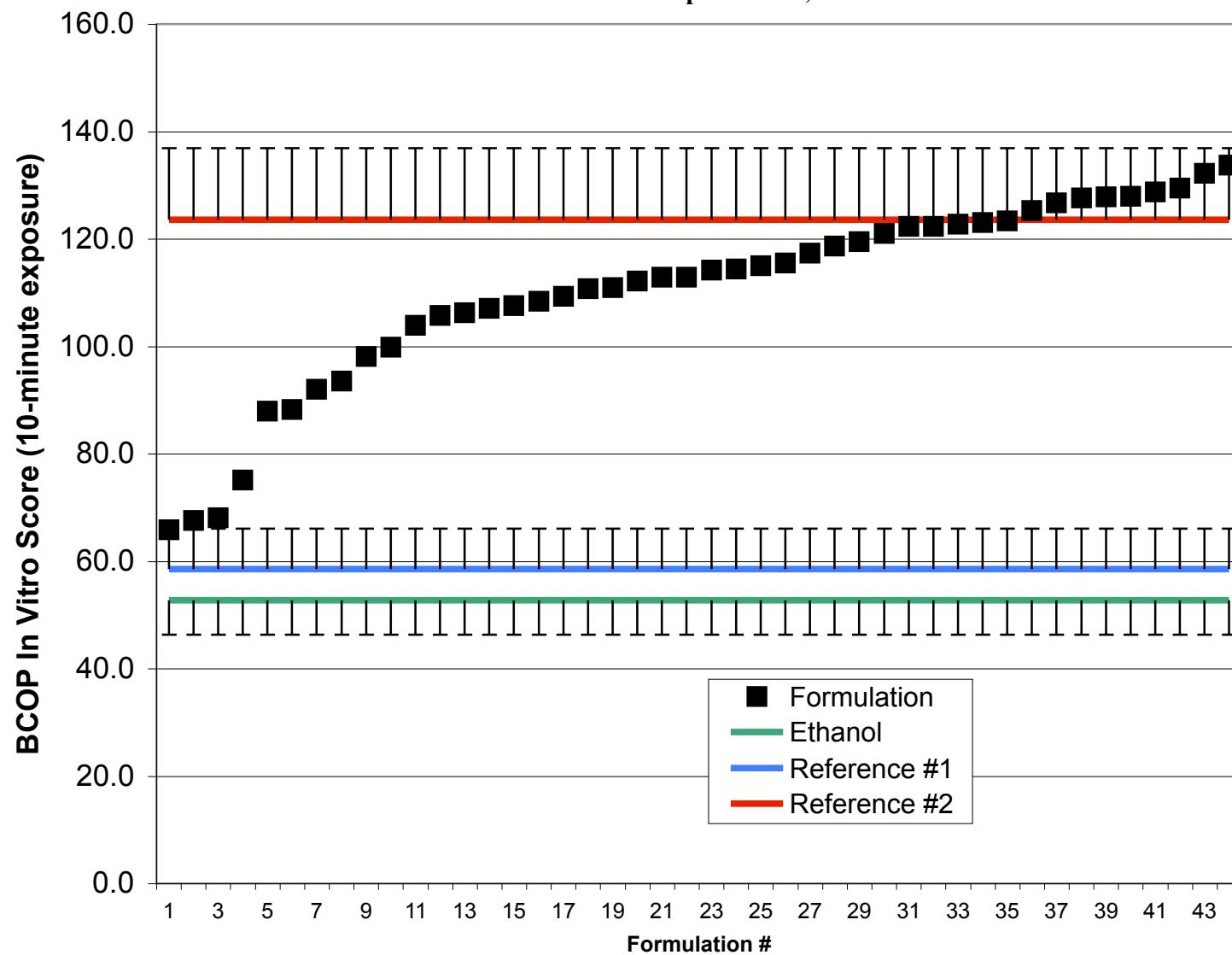
Volume	ANIMAL ID	TEST MATL	TIME	CORNEAL		IRIS	REDNESS	CONJUNCTIVAL		DRAIZE	DAYS-TO-CLEAR
				OPACITY	AREA			CHEMOSIS	DISCHARGE		
0.1	F38953	#1	24	1	3	1	2	2	1	30	EPA
			48	1	1	1	3	1	0	18	14
			72	1	1	1	3	1	0	18	GHS
			7 days	0	0	0	2	1	0	6	14
			14 days	0	0	0	0	0	0	0	
			21 days							0	
Volume	ANIMAL ID	MATL	MAS	OPACITY	AREA	IRIS	REDNESS	CHEMOSIS	DISCHARGE	DtC EPA	DtC GHS
0.1	F38953	#1	30	1	1.666667	1	2.6666667	1.33333333	0.33333333	14	
14	2,3,4		2	14		14					
14	2,3,5		2	14		14					
14	2,3,6		2	14		14					
14	2,4,5		2	14		14					
14	2,4,6		2	14		14					
14	2,5,6		2	14		14					
14	3,4,5		2	14		14					
14	3,4,6		2	14		14					
14	3,5,6		2	14		14					
14	4,5,6		2	14		14					
Volume	ANIMAL ID	TEST MATL	TIME	CORNEAL		IRIS	REDNESS	CONJUNCTIVAL		DRAIZE	DAYS-TO-CLEAR
				OPACITY	AREA			CHEMOSIS	DISCHARGE		
0.1	R2267	#2	24	0	0	0	1	1	0	4	EPA
			48	0	0	0	1	1	0	0	0
			72	0	0	0	0	0	0	0	GHS
			7 days							0	
			14 days							0	
			21 days							0	
Volume	ANIMAL ID	MATL	MAS	OPACITY	AREA	IRIS	REDNESS	CHEMOSIS	DISCHARGE	DtC EPA	DtC GHS
0.1	R2267	#2	4	0	0	0	0.6666667	0.66666667	0	0	3
0	2,3,4		4	3		0					
0	2,3,5		4	3		0					
0	2,3,6		4	3		0					
0	2,4,5		4	3		0					
0	2,4,6		4	3		0					
0	2,5,6		4	3		0					
0	3,4,5		4	3		0					
0	3,4,6		4	3		0					
0	3,5,6		4	3		0					
0	4,5,6		4	3		0					

Fragrance Graphs for
SC Johnson Submission
Dated September 3, 2004

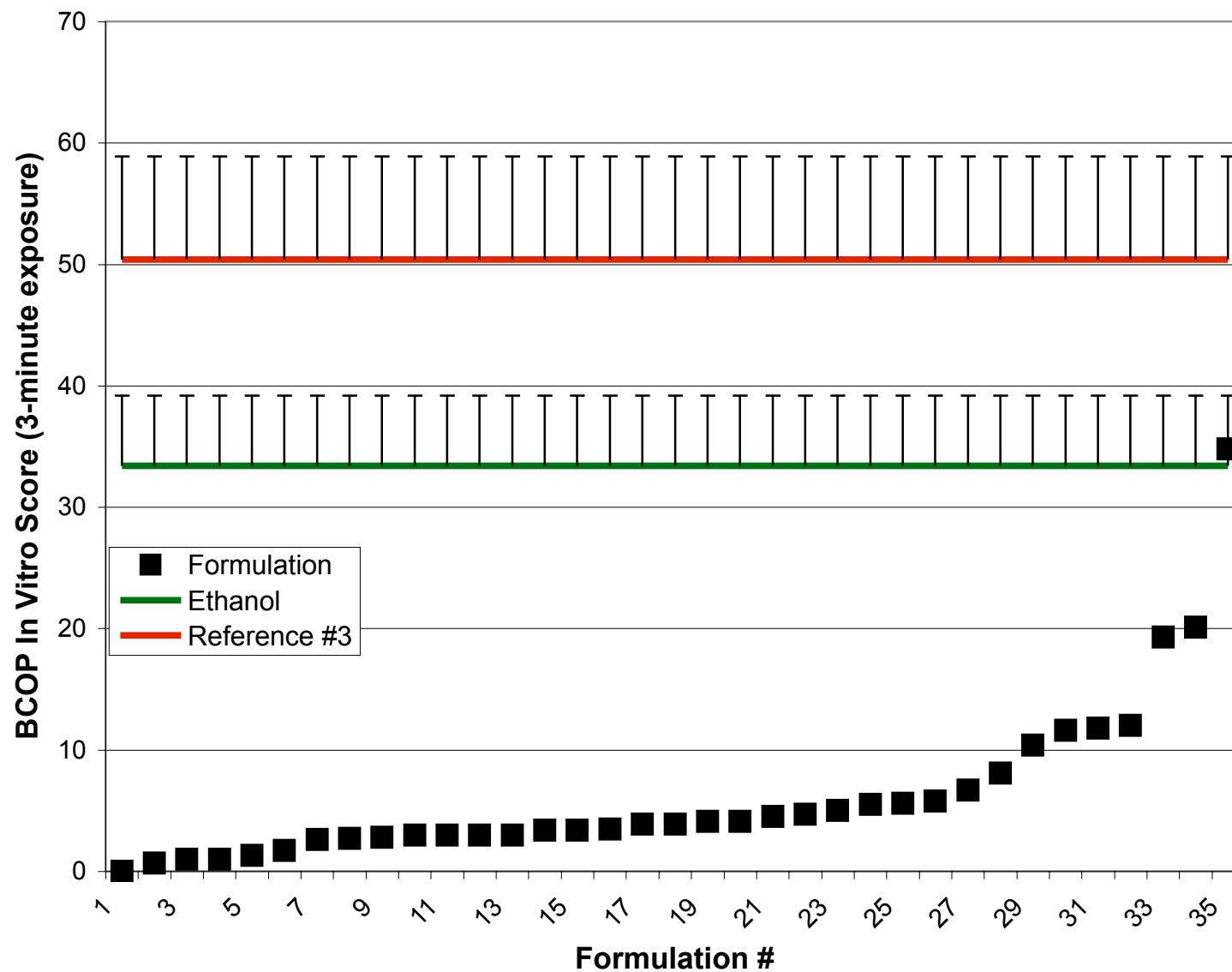
16 Dec 2005



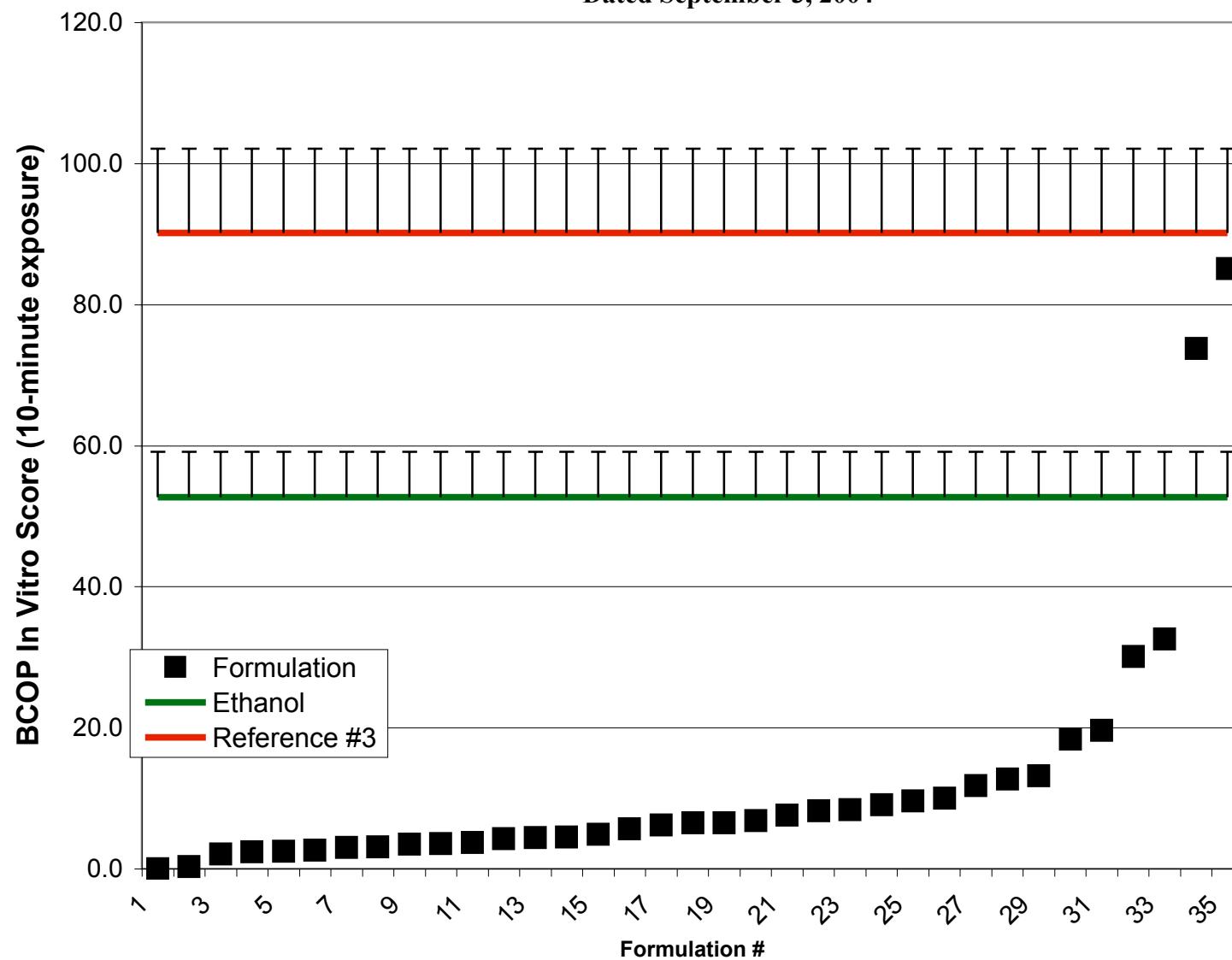
**Fragrance Graphs for
SC Johnson Submission
Dated September 3, 2004**



**Fragrance Graphs for
SC Johnson Submission
Dated September 3, 2004**



**Fragrance Graphs for
SC Johnson Submission
Dated September 3, 2004**



BCOP Data for SC Johnson Submission
Dated September 3, 2004

Ethanol	3-minute exposure	
	Opacity	
	Mean	OD490
	21.1	0.820
	STD	0.238
	CV	5.8
	13.7%	29.0%
	In Vitro Score	
	33.4	
	n=7	
Ethanol	10-minute exposure (normal positive control)	
	Opacity	
	Mean	OD490
	31.2	1.422
	STD	0.345
	CV	6.4
	15.3%	24.3%
	In Vitro Score	
	52.7	
Reference #1	Alcohol-based benchmark	
	3-minute exposure	
	Used as the first benchmark formulation	
	for the aerosol formulations	
	Opacity	
Reference #1	Mean	OD490
	20.6	IV Score
	STD	1.270
	3.5	39.7
	CV	0.308
	16.8%	6.6
	n=21	24.2%
	10-minute exposure	16.7%
Reference #2	Opacity	
	Mean	OD490
	28.6	IV Score
	STD	2.001
	4.1	58.5
	CV	0.415
	14.3%	7.6
	n=43	20.7%
	Used as the first benchmark formulation	
	for the aerosol formulations	
Reference #2	Ethanol Fragrance benchmark	
	3-minute exposure	
	Opacity	
	Mean	OD490
	53.7	IV Score
	STD	2.6
	8.5	93.3
	CV	0.5
	n=32	12.9
	10-minute exposure	13.8%
Reference #2	Opacity	
	Mean	OD490
	81.5	IV Score
	STD	2.805
	11.9	123.6
	CV	0.520
	n=32	14.6%
	10-minute exposure	13.3%
Reference #3	Opacity	
	Mean	OD490
	39.9	IV Score
	STD	0.693
	6.0	50.4
	CV	0.238
	n=84	8.5
	3-minute exposure	16.8%
Reference #3	Opacity	
	Mean	OD490
	61.0	IV Score
	STD	1.941
	7.9	90.1
	CV	0.459
	n=90	12.0
	10-minute exposure	13.3%
	Opacity	
	Mean	
	12.9%	
	23.7%	

FORMULAS

Test Material #	Group	Raw Material	Percentage
1	Fragrance Benchmark (Reference #3)	Fragrance Thickener	95-100 0-5
2	Ethanol/ Fragrance Benchmark (Reference #2)	Ethanol Fragrance	70-75 25-30
3, 4	Alcohol-based Benchmark (Reference #1)	Alcohol Active Dimethicone	85-90 10-15 1-5
5	Ethanol	Fragrance Ethanol	< 1 100
Fragrance Formulas	Membrane Formula	Fragrance Thickener	95-100 0-5
Fragrance Formulas	Aerosol Formula-1 ¹	Alcohol Fragrance	70-75 25-30
Fragrance Formulas	Aerosol Formula-2	Alcohol Fragrance	80-85 15-20
Fragrance Formulas	Aerosol Formula-3	Alcohol Fragrance	90-95 5-10

¹Most aerosol formulas fall within this category